

LEINART LAW FIRM  
11520 N CENTRAL EXPRESSWAY  
SUITE 212  
DALLAS, TX 75243

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

IN RE:  
LASKEY CARMEN CHATHAM (SSN: XXX-XX-8394)  
Debtor

Case No: 18-30959-SGJ-13  
Hearing Date: 11/14/2019

**Debtor's Modification of Plan after Confirmation**

Date: 9/27/2019

To the Honorable Bankruptcy Judge:

Pursuant to 11 U.S.C. Section 1329, the Debtor requests the following Modification of Debtor's Confirmed Plan herein:

**Trustee's History of Case**

Date Filed:	March 16, 2018	Total Payments Received to Date:	\$82,786.00
Date of 341:	April 23, 2018	Total Payments to be Current:	\$94,274.00
Date Confirmed:	July 20, 2018	Total Amount Delinquent:	\$11,488.00
		To Be Current Calculated Through:	September 15, 2019

**Modification of Debtor Payments to Trustee**

- Change monthly payment amount from \$5,744.00 per month to \$3,500.00 X 2; \$5,949.00 X 40; and/or
- The above change(s) will result in a new "BASE AMOUNT" of \$327,746.00 (total due to Trustee under Plan, if all payments timely made). AND
- Payments to the Trustee in the amount of \$3,500.00 will resume on or before 10/15/2019.

**Modification of Trustee Payments to Creditors**

- Change or provide for the treatment of the following claims:

Add/ Change	Creditor Name/Class Type	Collateral Description	Claim Amount	Value	Int Rate	Treatment
CHANGE	AUTOS FELIX DBA AUTO FELD	08 GMC YUKON	\$7,223.63	\$15,477.99	5.25%	Amount Paid
TC1m#28	Type: E(2) Secured/Vehicle					

**Debtor Attorney Fees**

Debtor's attorney shall be allowed an additional fee for this Modification in the total amount of \$400.00 of which \$0.00 is to be paid direct and \$400.00 is to be paid by the Trustee.

**Reason for Modification**

**Debtor's Modification of Plan after Confirmation, Page 2**  
**Case # 18-30959-SGJ-13**  
**LASKEY CARMEN CHATHAM**

This modification is requested for the following reason(s):

- To cure arrears to the Trustee.
- To change or provide for a claim (see claim treatment listed above).

**Conditions**

This modification will be approved with the following condition(s):

- Wage Directive must be submitted on or before 11/14/2019.
- If payment is increasing the debtor(s) will be responsible for making the increased portion until the amended Wage Directive takes effect.

Respectfully Submitted,

By: /s/ Marcus Leinart

LEINART LAW FIRM

Name: Marcus Leinart

State Bar Number: 00794156

**Debtor's Modification of Plan after Confirmation, Page 3**  
**Case # 18-30959-SGJ-13**  
**LASKEY CARMEN CHATHAM**

**Debtor's Modification of Plan after Confirmation**

Notice is hereby given that pursuant to 11 U.S.C. Section 1329, the attached Debtor's Modification of Plan After Confirmation dated 9/27/2019, will be approved by the Court without hearing, as the Debtor's Modified Chapter 13 Plan unless a party in interest files a written "Objection to Modification" WITHIN TWENTY FOUR (24) DAYS OF SERVICE (MAILING) HEREOF, provided the Modified plan is recommended by the Standing Chapter 13 Trustee and the Debtor has made any subsequent payments under the Modified Plan.

TO BE CONSIDERED, AN "OBJECTION TO MODIFICATION" MUST BE MADE IN WRITING, FILED WITH THE COURT, AND A COPY SERVED ON THE FOLLOWING PARTIES NO LATER THAN 24 DAYS AFTER SERVICE OF THIS MODIFICATION.

Debtor: LASKEY CARMEN CHATHAM, 10106 HUFFINES DR, ROWLETT, TX 75089  
Attorney: LEINART LAW FIRM, 11520 N CENTRAL EXPRESSWAY, SUITE 212, DALLAS, TX 75243  
Court: CLERK'S OFFICE, US BANKRUPTCY COURT, 1100 COMMERCE ST., 12TH FLOOR, DALLAS, TEXAS, 75202  
Trustee: TRUSTEE'S OFFICE, 125 E. JOHN CARPENTER FREEWAY, SUITE #1100, IRVING, TEXAS 75062

**Notice of Court Hearing and Trustee's Pre-Hearing Conference**

On 11/14/2019, which is at least twenty four (24) days from the date of service hereon, a Pre-Hearing Conference with the Standing Chapter 13 Trustee, on the attached " Debtor's Modification of Plan after Confirmation" will be at 8:30 o'clock a.m. at:

105 Decker Court, Suite 120, 1st Floor, Irving, TX 75062

Any objections to the proposed Modification not resolved or defaulted at the Trustee's Pre-Hearing Conference will be heard by the Court at **2:00 PM** on **11/18/2019** at:

1100 Commerce Street, Fourteenth Floor, Dallas, Texas

YOU DO NOT HAVE TO ATTEND THE TRUSTEE'S PRE-HEARING CONFERENCE OR COURT HEARING UNLESS YOU OBJECT TO THE MODIFICATION.

**Certificate of Service**

I hereby certify that a true copy of the foregoing "Notice of Hearing on Debtor's Modification of Plan After Confirmation" and "Notice of Court Hearing and Trustee's Pre-Hearing Conference" thereon with a copy of the " Debtor's Modification of Plan After Confirmation" attached has been served by me on or before 10/21/2019, on the parties listed on the attached matrix by United States First Class Mail or via electronic mail.

By: /s/ Marcus Leinart

LEINART LAW FIRM

Name: Marcus Leinart

State Bar Number: 00794156

Label Matrix for local noticing  
0539-3  
Case 18-30959-sgj13  
Northern District of Texas  
Dallas  
Fri Sep 27 11:09:10 CDT 2019

Garland ISD  
c/o Perdue Brandon Fielder Et Al  
500 E. Border St. Ste. 640  
Arlington, TX 76010-7457

WaterView Community Association, Inc.  
7801 Kings Court  
Rowlett, TX 75089-7818

Ashley Funding Services, LLC its successors  
assigns as assignee of Syndicated  
Office Systems, Inc.  
Resurgent Capital Services  
PO Box 10587  
Greenville, SC 29603-0587

Attorney General of Texas  
Collections Div/Bankruptcy Sec  
PO Box 12548  
Austin, TX 78711-2548

Conn Appliances, Inc.  
c/o Becket and Lee LLP  
PO Box 3002  
Malvern PA 19355-0702

Exeter Finance Corp  
PO Box 167399  
Irving, TX 75016-7399

Garland ISD  
c/o Eboney Cobb  
Perdue, Brandon, Fielder, Collins & Mott  
500 E. Border Street, Suite 640  
Arlington, Texas 76010-7457

Internal Revenue Service  
Centralized Insolvency Operations  
PO Box 7346  
Philadelphia, PA 19101-7346

LVNV Funding, LLC its successors and assigns  
assignee of CVF Consumer Acquisition  
Company  
Resurgent Capital Services  
PO Box 10587  
Greenville, SC 29603-0587

Dallas County  
Linebarger Goggan Blair & Sampson, LLP  
c/o Sherrel K. Knighton  
2777 N. Stemmons Frwy  
Suite 1000  
Dallas, TX 75207-2328

Rushmore Loan Management Services, LLC  
P.O. Box 55004  
Irvine, CA 92619-5004

1100 Commerce Street  
Room 1254  
Dallas, TX 75242-1305

Ashro Lifestyle  
PO Box 800849  
Dallas, TX 75380-0849

Autos Felix d/b/a Autofelix.com  
12253 Self Plaza Drive  
Dallas, Texas 75218-1471

Conns Credit Corp  
3295 College St.  
Beaumont, TX 77701-4611

Exeter Finance LLC  
4515 N Santa Fe Ave. Dept. APS  
Oklahoma City, OK 73118-7901

Ginny's  
c/o Creditors Bankruptcy Service  
P.O. Box 800849  
Dallas, TX 75380-0849

LVNV Funding  
PO Box 10585  
Greenville, SC 29603-0585

LVNV Funding, LLC its successors and assigns  
assignee of Homecomings Financial  
Network, Inc.  
Resurgent Capital Services  
PO Box 10587  
Greenville, SC 29603-0587

Exeter Finance LLC, c/o AIS Portfolio Servic  
4515 N Santa Fe Ave. Dept. APS  
Oklahoma City, OK 73118-7901

U.S. Department of Education  
PO Box 16448  
St. Paul, MN 55116-0448

Ashley Funding Services LLC  
Assignee of Syndicated Office Systems  
Greenville, SC 29603

Ashro Lifestyle  
c/o Creditors Bankruptcy Service  
P.O. Box 800849  
Dallas, TX 75380-0849

(p)TEXAS COMPTROLLER OF PUBLIC ACCOUNTS  
REVENUE ACCOUNTING DIV - BANKRUPTCY SECTION  
PO BOX 13528  
AUSTIN TX 78711-3528

Dallas County Tax Assessor/Collector  
John R. Ames, CTA  
PO Box 139066  
Dallas, TX 75313-9066

Garland ISD  
PO Box 461407  
Garland, TX 75046-1407

Ginnys  
PO Box 800849  
Dallas, TX 75380-0849

LVNV Funding, LLC its successors and assigns  
assignee of Bluestem Brands, Inc.  
Resurgent Capital Services  
PO Box 10587  
Greenville, SC 29603-0587

Leinart Law Firm  
11520 N. Central Expressway  
Suite 212  
Dallas, Texas 75243-6608

Linebarger Goggan Blair et al  
2777 N. Stemmons Frwy, Ste 1000  
Dallas, TX 75207-2328

Midnight Velvet  
PO Box 800849  
Dallas, TX 75380-0849

Midnight Velvet  
c/o Creditors Bankruptcy Service  
P.O. Box 800849  
Dallas, TX 75380-0849

Monroe & Main  
c/o Creditors Bankruptcy Service  
P.O. Box 800849  
Dallas, TX 75380-0849

Monroe and Main  
PO Box 800849  
Dallas, TX 75380-0849

Montgomery Ward  
c/o Creditors Bankruptcy Service  
P.O. Box 800849  
Dallas, TX 75380-0849

Montgomery Ward  
PO Box 800849  
Dallas, TX 75380-0849

Pinnacle Credit Services, LLC  
Resurgent Capital Services  
PO Box 10587  
Greenville, SC 29603-0587

Pinnacle Credit Services, LLC its successors  
assigns as assignee of Equable Ascent  
Financial, LLC  
Resurgent Capital Services  
PO Box 10587  
Greenville, SC 29603-0587

Reviver Financial LLC/CashNet  
PO Box 3023  
Hutchinson, KS 67504-3023

Reviver Financial LLC/Rise  
PO Box 3023  
Hutchinson, KS 67504-3023

Rhodes Capital LLC  
6833 S. Dayton St. PMB  
Englewood, CO 80112-3624

Rhodes Capital, LLC  
c/o Timothy J. Harvard  
Whitaker Chalk Swindle & Schwartz  
301 Commerce St., Suite 3500  
Fort Worth, TX 76102-4135

RhodesCapital, LLC  
c/o Timothy J. Harvard  
Whitaker Chalk Swindle&Schwartz PLLC  
301 Commerce Street, Suite 3500  
FortWorth, TX 76102-4135

Selene Finance  
9990 Richmond Ste. 400 South  
Houston, TX 77042-4546

Texas Alcoholic Beverage Commission  
Licenses and Permit Division  
PO Box 13127  
Austin, TX 78711-3127

Texas Workforce Commission  
101 E 15th St, RM 370  
Austin, TX 78778-0001

Texas Workforce Commission  
TEC Building- Bankruptcy  
101 E 15th St  
Austin, TX 78778-0001

Texas Workforce Commission, Special Actions  
Regulatory Integrity Division  
101 E. 15th Street, Room 556  
Austin, TX 78778-0001

U.S. Department of Education  
National Payment Center  
P.O. Box 790336  
St. Louis, MO 63179-0336

US Department of Education  
PO Box 16448  
St. Paul, MN 55116-0448

US Dept of Education  
PO Box 5609  
Greenville, TX 75403-5609

United States Attorney- North  
3rd Floor, 1100 Commerce St  
Dallas, TX 75242

United States Trustee  
1100 Commerce Street  
Room 976  
Dallas, TX 75242-0996

United States Trustee - Eastern District  
Rm 9C60 1100 Commerce St  
Dallas, TX 75242-1001

Waterview HOA  
7801 Kings Ct.  
Rowlett, TX 75089-7818

Wilmington Savings Fund Society, FSB  
Selene Finance, LP  
9990 Richmond Ave., Suite 400 South  
Houston, TX 77042-4546

Wilmington Savings Fund Society, FSB,  
Quintairos, Prieto, Wood & Boyer, PA  
1700 Pacific Avenue, Suite 4545  
Dallas, Texas 75201-4641

Laskey Carmen Chatham Jr.  
10106 Huffines Dr.  
Rowlett, TX 75089-8588

Marcus B. Leinart  
Leinart Law Firm  
11520 N. Central Expressway  
Suite 212  
Dallas, TX 75243-6608

Thomas Powers  
105 Decker Court, STE 1150  
Irving, TX 75062-3137

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified  
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Comptroller of Public Accounts  
Revenue Accounting/Bankruptcy Div  
PO Box 13528  
Austin, TX 78711

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)AUTOS FELIX

(u)Rhodes Capital, LLC

(u)Wilmington Savings Fund Society, FSB, d/b/

(d)Dallas County  
Linebarger Goggan Blair & Sampson, LLP  
c/o Sherrel K. Knighton  
2777 N. Stemmons Frwy  
Suite 1000  
Dallas, TX 75207-2328

(d)Rushmore Loan Management Services, LLC  
P.O. Box 55004  
Irvine, CA 92619-5004

(d)WaterView Community Association, Inc.  
7801 Kings Court  
Rowlett, TX 75089-7818

End of Label Matrix  
Mailable recipients 60  
Bypassed recipients 6  
Total 66